

CGB-CC-0717

The Upper Room Ministries

P.O Box 1872 ----- 322 S. 24th St
Clarksburg, WV. 26301
Phone 304-622-6557

RECEIVED & INSPECTED

JUN 12 2007

FCC - MAILROOM

Pastor: Rev. Frank Shreve - 622-7651
322 South 24th St. Clarksburg, WV 26301

Sec-Treasurer: Tom Langford - 624-7681
RR 1, Box 468, Mt. Clare, 26408

June 7, 2007

Office of the Secretary
Federal communications commission
Attention: CGB Room 3-B431
445 12th Street SW
Washington, DC 20554

Re: Request for Exemption from Commission's Closed Captioning requirement

The Upper Room Church is requesting an exemption from the Commission's Closed Captioning requirement for its program "Vision Ministries" on the basis of undue burden pursuant of Section 79:1 (f) of the Commission's rules.

Introduction

The Upper Room Church is a non-profit ministry located in Clarksburg West Virginia.

One of the missions of our church is to spread the Word of God to the people and by doing so, we hope to develop them into moral productive citizens. In order to help reach this mission goal, we are on several radio stations and we wish to produce a weekly thirty minute program "VISION MINISTRIES" that will be airing on Sunday mornings at 7: am on WBOY - NBC - Channel 12 in Clarksburg, WV. This broadcast will enable the church to reach over 200,000 households in the Clarksburg/Weston DMA.

These programs will be produced and edited by the members of the church. It is suited to reach a general audience from youth through senior adult.

Nature and Cost of Closed captioning.

We have investigated the possibility and researched the costs of providing closed captioning for thirty minute programs by outside sources to be approximately \$250.00 per 30 minute program. We have also investigated the possibilities of purchasing a studio type closed captioning unit to be approximately \$10,000.00 to \$12,000.00. It is our goal to eventually purchase the needed equipment but it will have to be over a process of time and then we would be able to have closed caption capabilities.

Impact on the Operation of the Program Provider

The current airtime cost per episode is \$250.00 or \$13,000.00 annually. Closed captioning would increase the cost per episode by \$250.00 which would bring the cost per episode to \$500.00. These additional costs would prohibit the church from airing the program and altering the church's ability to meet its mission goals. Close captioning assistance is not available from local television stations.

Beyond the financial burden imposed on The Upper Room Church, providing Closed Captioning also negatively impacts the timing and timelines of the production process. Providing closed captioning through an outside provider would require filming and editing well enough in advance of the scheduled broadcast to have time to ship it to the closed captioning provider, allow a period of transcription, dubbing to the appropriate format and delivery of the program to the broadcast station.

Financial Resources of the Programs Provider

Our Church is a non-profit religious (501(c) 3) organization. A copy of our Financial Report is attached. All funds spent on closed captioning would divert funds away from our outreach ministry and charitable work.


Summary

We are respectfully requesting a waiver of the closed captioning requirement under Section 79.1 (f) of the Commission Rules based upon:

- a. Our VISION MINISTRIES program is locally produced and requiring Closed captioning would create an undue burden.
- b. The costs of Closed Captioning would have a significant impact on the Church's operation and mission goals.
- c. The content is religious based and would be considered a non-new presentation

Respectfully submitted.

The Upper Room Church


Pastor Frank Shreve

cc:WBOY-TV
FNS/fs

Upper Room Church
Income and Expenses - Actual
For All Accounts
January 01 through December 31, 2006

INCOME

Income	
General Fund Income	\$ 151,920
Interest	64
Missionary Offering	511
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Total Income	\$ 152,495
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TOTAL INCOME	\$ 152,495

EXPENSE

Expense	
Banquets & Meetings	\$ 1,255
Building Insurance	1,918
Building Maintenance	3,932
Building Supplies	245
Charity	2,779
Church Literature	51
Church Tithe	14,950
Clerical & Salary Expense	21,200
Color Copier Expense	7,324
Computer Programs	107
Crafts	1,957
Electric (Church)	2,008
Electric (Outreach)	462
Electric (Parsonage)	686
Evangelistic	3,475
Fire (Church)	354
Fire (Parsonage)	90
Flowers	459
Garbage	179
Gasoline	4,746
Heating (Church)	4,803
Heating (Hall)	1,724
Heating (Parsonage)	1,928
Janitorial Supplies	893
Land Expenses	450
Lowes Business Account	2,554
Miscellaneous	525
Missions	1,432
Office Equipment	148
Office Expense	1,274
Office Supplies	1,668
Online Services	60
Postage	1,247
Radio Broadcasts	11,835
Repairs	1,693
Sound Equipment	828
Sound Expenses	720
Sunday School Literature	2,924
Telephone	1,362
Television Equipment	8,952
Television Expense	676
Television Program	14,470
Vehicle Insurance	1,074
Vehicle Repair & Upkeep	403
Video Equipments	1,046
Water (Church)	458
Water (Fellowship Hall)	407
Water (Parsonage)	409
Youth Activities	2,189
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Total Expense	\$ 136,328
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TOTAL EXPENSE	\$ 136,328

NET INCOME (LOSS) \$ 16,168

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Clarksburg, WV. 26301

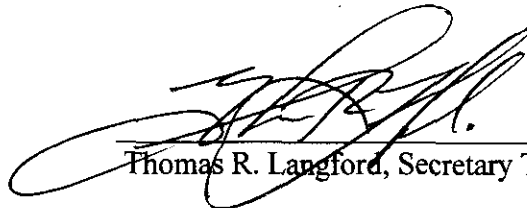
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AFFIDAVIT

I, Thomas R. Langford, Secretary, Treasurer of the Upper Room Church have reviewed the attached Petition for Exemption for Closed Captioning Requirements on the basis of Undue Burden filed on behalf of the Upper Room Church. Upon information and belief, I find the statements regarding our organization and VISION MINISTRIES to be true and accurate and I affirm that the petition complies with the requirements set forth in Section 79.1(f) of the Commission's rules.


Thomas R. Langford, Secretary Treasurer

Date : June 7, 2007